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1 A. I am not sure at this very moment. Hopefully
2 in the very near future.

3 Q. Is that something you are working on?

4 A. Yes. It's on my mind, yes. It is something
5 that we are working on.

6 Q. How much are you seeking -- are you seeking
7 lost salary?

8 A. I am, you know, I am not sure how to answer the
9 question as far as, you know, I still really need to
10 discuss with my attorneys and everything what I am
11 seeking. I really can't answer that question right
12 now.

13 Q. So you don't know what damages you are seeking?

14 MS. BREWINGTON: I am going to object.
15 You can answer.

16 BY MR. WILLIAMS:

17 Q. I am asking for your understanding.

18 A. Okay.

19 Q. You don't know what damages you are seeking?

20 A. Not all the damages, no. No, I do not know.

21 Q. Are you seeking damages for pain and suffering
22 or humiliation?

23 MS. BREWINGTON: I am going to object.
24 She said she is not sure.

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1 THE WITNESS: Do I answer?

2 BY MR. WILLIAMS:

3 Q. You don't know?

4 A. I don't know.

5 Q. Have you incurred medical expenses that you are
6 seeking to recover for?

7 A. Not many. I don't have many. My -- Tamala
8 Robinson was -- she didn't take my insurance, so it's
9 not much medical because I had insurance.

10 Q. You mentioned a couple times about your hair
11 falling out.

12 When did that start and when did that
13 stop?

14 A. I notice a lot of hair start coming out in my
15 comb when I get really stressed. In the beginning of
16 September, I think I really noticed my hair starting
17 to -- extra hair coming out when I comb my hair.

18 Q. When did that stop?

19 A. I don't know. I still had hair come out for a
20 while. It's not coming out like that now or anything.
21 I think that was just a symptom of everything going
22 on, but I really can't tell you the day or when it
23 actually stopped.

24 Q. On page 11, the answer to interrogatory No. 9

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1 talks about an antidepressant medication.

2 A. Yes.

3 Q. Is that something different than what you
4 talked about a few minutes ago that you took for
5 difficulty sleeping?

6 A. No. That's the same.

7 Q. And when you say that the name of the
8 medication is in your medical records, are you talking
9 about doctor --

10 A. Senu-Oke.

11 Q. Dr. Senu-Oke's records?

12 A. Dr. Senu-Oke's records, yes.

13 Q. Have you requested a copy of those records?

14 A. No, I haven't. I haven't been asked to.

15 Q. Your counsel hasn't suggested that you request
16 those records?

17 A. She said it would be a good idea, but nobody
18 requested it -- told me to request them.

19 Q. Nobody told you to request them?

20 A. Correct.

21 Q. You talk about the fact that you have had two
22 biopsies and an examination of the thyroid glands.

23 What does that have to do with this case?

24 A. My whole point of putting it in there, I didn't

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1 have any problems prior to this situation, and I know
2 stress happens in many different ways and I had a
3 full, complete physical in June of 2001, that can show
4 that my thyroid, everything -- since then, since the
5 stress and everything that I went through, all kinds
6 of things happened to me.

7 Q. And what evidence do you have that --

8 A. A large thyroid gland that's sticking out of my
9 neck and I keep getting biopsies now. That's that
10 evidence.

11 Q. And what evidence do you have that that's
12 related to this?

13 A. Oh, I don't have evidence that it's related.
14 It happened during the same time, and I know stress
15 happens in many forms, but I know prior, I have
16 documented that I have documentation that I had a
17 complete and thorough physical with no problems prior
18 to this.

19 Q. In answer to paragraph 12 on page 13.

20 A. Yes.

21 Q. The question is: "Describe in detail each and
22 every action taken by defendant in which you claim was
23 motivated by an intent to discriminate on the basis of
24 race"; do you see that?

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1 A. Sorry. You said paragraph --

2 Q. At the top of the page.

3 A. Okay.

4 MS. BREWINGTON: I think you are on a
5 different page.

6 MR. WILLIAMS: Page 13.

7 THE WITNESS: Oh, I am sorry. No wonder I
8 don't see it.

9 BY MR. WILLIAMS:

10 Q. At the top.

11 A. Yes. Okay.

12 Q. Now, you say, in addition to the office space
13 issue, you say that the plaintiff feels that the
14 following promotions were discriminatory, and, again,
15 this is asking you about discrimination on the basis
16 of race, "The promotion of Paul Morris without
17 posting." It's your position that that was
18 discriminatory on the basis of race?

19 A. It blocked out any black person from applying
20 for that position.

21 Q. And that happened -- recognizing that there was
22 an issue about whether he was promoted or reclassified
23 and not, I don't have a desire to get into a debate
24 with you about that, but the -- when was it that this

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1 -- what you allege to be a promotion occurred?

2 A. I am not actually sure. June, May. I have
3 some e-mails -- I have a particular e-mail, I am not
4 sure if it was May or June, that Paul Morris wrote
5 giving everybody directives to keep their door open.
6 So that was way before we had heard in a news letter
7 that Paul was promoted. He was already giving out
8 directives before that was issued to us.

9 Q. So, what you characterize as a promotion that
10 you are complaining about happened way before your
11 move, way before you were informed that you were going
12 to be moved to new office space?

13 A. No. I am just saying I don't know when it
14 happened. I know May or June that Paul wrote this
15 directive to us, and we were notified, I think, in
16 July of newsletter, but I am not sure exactly when
17 that took place.

18 Q. July of 2002?

19 A. 2002, correct.

20 Q. So, my question is: What you characterize as a
21 promotion of Paul Morris happened before you were told
22 that you were going to be moved?

23 A. Yes.

24 Q. And before you were moved in October of 2002?

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1 A. Yes. I am sorry. Yes.

2 Q. And before you filed a charge of discrimination
3 in November of 2002?

4 A. Correct.

5 Q. Now, the next promotion that you claim was
6 discriminatory was the acting position of Jacquita
7 Wright-Henderson. I think we talked about that
8 earlier.

9 A. Yes.

10 Q. She is African-American, is she not?

11 A. Correct.

12 Q. Am I correctly understanding your response to
13 the question in paragraph 12 that you believe that
14 that promotion decision was discriminatory on the
15 basis of race?

16 A. That was one that I put in there, yes.

17 Q. And you think that that discriminated against
18 you on the basis of your race?

19 A. I think putting her -- I think it all -- I am
20 not going to say directly. I think it all falls into
21 one big jumbled mess. Again, like I said, if you know
22 anything about black history, the blacks were the ones
23 put in charge of the blacks to keep them in place.

24 Why was everybody else -- Paul Morris was in charge of

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1 everyone else except us.

2 A black person was put in our place to
3 take care of us. No. 1, we didn't understand why we
4 were separated there. No. 2, there was no promotions
5 or anything prior to us complaining. And then, all of
6 a sudden, there is a black person promoted, but, yet,
7 she is promoted not to take care of all TRIO and youth
8 programs but to deal with Upward Bound Math and
9 Science.

10 Q. If the college placed a white employee in the
11 acting position that Jacquita Wright-Henderson
12 received, would that have been discrimination on the
13 basis of race?

14 MS. BREWINGTON: Objection.

15 THE WITNESS: I don't know. All I know is
16 how we feel and how I felt when Jacquita was put over
17 us and the history of slavery and all that. So, I
18 really can't answer that question on how I would feel
19 if a white person was put in because a white person
20 wasn't put in, and I am talking about every day of my
21 life dealing with this at that time.

22 BY MR. WILLIAMS:

23 Q. The next thing you complain about is the
24 promotion of Andrea Collins.

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1 She is also African-American, is she not?

2 A. Correct.

3 Q. And is it because she is African-American that
4 you believe that the decision by the college to
5 promote her was discriminatory on the basis of race?

6 A. I believe if Andrea Coleman wasn't black, there
7 may be a chance she wouldn't have been there. Again,
8 it feels like they are going to -- they filed
9 discrimination, so let us keep the blacks in there.
10 That's in their thinking. But as far as black people,
11 it's like getting the blacks to take care of the
12 blacks.

13 I mean, and then she didn't even -- she
14 didn't even become manager of her own program that she
15 had worked with for three years as program manager.
16 You know, she didn't have any Upward Bound
17 Math/Science position, but, yet, they walked Andrea
18 Coleman in and it's like, Why? And there was another
19 black person.

20 I probably would have thought actually
21 about that one differently if it was a white person
22 that walked in, but, again, it was another black
23 person that they are trying to get us to -- to keep
24 us, I don't know.

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1 Q. So, if the college promoted a white employee in
2 that circumstance, it would not have been
3 discrimination against you on the basis of your race?

4 MS. BREWINGTON: Objection.

5 THE WITNESS: I can't answer that.

6 BY MR. WILLIAMS:

7 Q. The next one is the lateral move of Rosanna
8 Brown-Simmons.

9 She is also African-American; correct?

10 A. Correct.

11 Q. And you believe that that decision by the
12 college discriminated against you on the basis of your
13 race?

14 A. I believe that it was a, I don't want to say
15 racist decision, but Rosanna, again, she is getting
16 promoted. Student enrichment coordinator, same thing
17 I am, acting where I wasn't, but, yet, there is the
18 black getting put into that position. And none of
19 these blacks held any program -- we had one program
20 manager that was black prior to us complaining.

21 Q. We talked a little bit earlier about your hours
22 and you wanted to work nine to five; is that what you
23 wanted to do?

24 A. I asked that and -- yes.

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1 Q. And you understood that the campus director had
2 the authority and responsibility to determine working
3 hours for the campus?

4 A. Yes. That's why I sent a letter to him, but it
5 was rejected. It didn't even get to him until after
6 later when I wrote him another letter.

7 Q. You talk about program calendars for on-site
8 school visits were changed from 30 days to 90 days.

9 A. Where is that?

10 Q. The end of the paragraph we were just looking
11 at in answer to --

12 A. Okay.

13 Q. Do you know why that decision was made?

14 A. I don't know because it was very difficult to
15 try to get appointments. Our program was different
16 than the regular programs. Our program was a program
17 where we just went to visit the students like in the
18 beginning -- end of October until around the beginning
19 of December. So -- and we had, like, some students --
20 a lot of schools we only had one student in and it was
21 very difficult arranging a program calendar where all
22 -- trying -- counselors wouldn't do that. I mean, it
23 just got very difficult.

24 The other programs would be in the school.

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1 That was designated. Classic and Upward Bound, they
2 knew they were going to be at Howard at 8:00. They
3 knew they were going to be at DelCastle. They were
4 all local. We were regional, 50 miles out. So we
5 would call just to meet with John Doe, and it's like,
6 Well, I can't have that on my schedule right now;
7 that's too far in advance. We had a difficult time
8 and we tried to explain that we can't just get
9 calendars like that.

10 So, a lot of the stuff we did, we did our
11 best to do what they were asking so we end up getting
12 a lot of tentative things. You know, we -- I mean, it
13 was just like we would call, we would make our
14 appointment, nobody would call, but I am trying to
15 meet with this person. I haven't heard from the
16 counselor. I am trying to make an appointment for six
17 weeks in advance and nobody is calling me back so I
18 put that tentative on my calendar. It just -- it was
19 never like that before.

20 We made 30-day calendars so we could focus
21 30 days, and, that way, we can achieve the best for
22 our students. And then from that 30 days, we would go
23 onto the next 30 days and the next group.

24 Q. The paragraph 13, the answer, again, this talks

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1 about each and every action taken by defendants which
2 you claim was motivated by an intent to retaliate.
3 Your answer to that question is, No. 1, your work
4 hours were changed. We just talked about that a
5 minute ago; is that correct?

6 A. Yes.

7 Q. Your work hours, during the time that you were
8 working from nine to five, were those work hours ever
9 approved by the campus?

10 A. I wasn't working nine to five. I worked 8:30
11 to 4:30.

12 Q. What change are you talking about here then?

13 A. That one, looking at this, "Answering
14 plaintiff's work hours were changed," that wasn't me.
15 That one should be Ken Cole. He is the one who had
16 change in work hours.

17 Q. But this is your answer?

18 A. Yes, I see that.

19 Q. So you are saying this shouldn't be in here?

20 A. This one here -- my work hours were not
21 changed. I know Ken Cole's were changed. So I must
22 -- when I signed this, I didn't realize that one
23 because mine was not.

24 Q. So it was an oversight?

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1 A. Mm-hmm.

2 Q. You are saying that shouldn't be here?

3 A. For me, yes.

4 Q. Now, the next thing you say is "she," and I
5 assume this refers to you, "was harassed through
6 e-mail"; do you see that?

7 A. Yes.

8 Q. Which e-mail are you talking about?

9 A. I don't know. "She was harassed through
10 e-mail." I guess the -- I don't know. I am not sure
11 what that means right there. What I would say is just
12 the scrutiny of, like you said, our calendars, when we
13 did them, we got e-mails if this needs to be done. If
14 it wasn't done, we got more e-mails as far as that's
15 concerned. E-mail after e-mail about, No, this is not
16 done right; we need it done over because of the
17 changes, and then all of the changes that took place
18 all of a sudden, I am assuming that's what that is.

19 Q. But you don't know what it is? When you say,
20 "I am assuming that's what it is," is that what it is?

21 A. The e-mails -- that's the only thing it could
22 be, yes, sir.

23 Q. So, the e-mails that you are describing relate
24 to managing -- the way in which the program was

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1 managed and the way in which you were held
2 accountable?

3 A. No. Not how -- no. No. No. No. Not
4 accountable. I think because there was so many
5 changes that happened and we wasn't understanding all
6 of the changes to the, you know, how they wanted it
7 because, don't forget, it had been to be eliminated
8 down to us, so when we did something -- we were just
9 lost. We just didn't understand. Our program manager
10 took a lot of that weight and said, We need this, we
11 need that. This is not right, no, you need to do it
12 right. This is not right, you need to do it again.
13 This is not right, you need to do it again. So that's
14 what we were going through.

15 Q. And is that also what you are talking about
16 when you refer to a scrutiny of her work schedule?

17 A. Yes.

18 Q. A scrutiny of what your schedule was, what you
19 were doing on any given day?

20 A. Yes. I mean, we -- we, since I have been
21 there, as any coordinator, we would go, we would
22 reserve our car, we would go see our student, we would
23 get all our paperwork signed, and we would come back.
24 We would notate everything in our folders and put all

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1 our comments down.

2 We got it where they wanted us to sign in
3 at a certain time, sign in the school, have the
4 student sign in at what time we was there or -- I
5 mean, it just got so much that they were asking, and,
6 to me, that's part of the work schedule, the sign in
7 and the sign out every single time we did something,
8 which we had never done before. So, with everything
9 that was added to what we were doing on top of that,
10 it just got really stressful.

11 Q. Turn to page 14.

12 A. (Witness complies.)

13 Q. Paragraph 15. First of all, the question says,
14 "Describe in detail the 'employment opportunities'
15 referred to in paragraph 87 of the complaint."

16 Paragraph 87 of the complaint, which is on
17 -- it's not numbered by pages, but if you turn to
18 paragraph 87 of the complaint, which is in Brown No.
19 1.

20 A. Mm-hmm.

21 Q. It talks about continuing to suffer loss of
22 employment opportunities, loss of income, loss of
23 other benefits; do you see that?

24 A. Yes.

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1 Q. Your answer talks about the program manager
2 position; is that the one where --

3 A. That's one of them.

4 Q. Who got that?

5 A. No one.

6 Q. Pardon me?

7 A. No one. I don't know who got that. I wasn't
8 even given an interview.

9 Q. That was the one that was posted three times?

10 A. Yes.

11 Q. And the third time, you didn't apply?

12 A. The third time, I didn't, and then Andrea
13 Coleman came in.

14 Q. And is it your understanding that your
15 complaint is that that was race discrimination or
16 retaliation or both?

17 A. Retaliation.

18 Q. Not race?

19 A. As far as my -- no. I would say that's
20 retaliation.

21 Q. And the next sentence says, "This has resulted
22 in the loss of additional pay and additional stress
23 related symptoms; this ongoing retaliation has led
24 answering plaintiff to resign which would eliminate

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1 future opportunities for advancement."

2 Was it this program manager's decision
3 that really triggered your resignation?

4 A. There was so much going on there with us, and
5 that was the last straw. Absolutely. Absolutely.
6 And then after all -- and not getting an interview,
7 No. 1, knowing Paul Morris is on the committee,
8 screening committee, No. 2, finally getting an
9 interview, within the next two to three days getting a
10 letter, no one is coming in, no one is coming in, and
11 then they bring Andrea Coleman in who started after I
12 who never even got her program manager's position, it
13 just --

14 Q. Turn to page 15 and 16. Interrogatory No. 18
15 asks about -- asks for you to detail every attempt you
16 have made to find employment, seek a promotion, or
17 pursue education or training?

18 A. This is page 15, you said?

19 Q. The question is on page 15. The answer is on
20 the next page, page 16.

21 A. Okay.

22 Q. Is this a complete listing of every attempt you
23 have made to find employment, seek a promotion, or
24 pursue education or training?

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1 A. Yeah. There was a couple other things that's
2 not included that I asked for, but, to me, it was no
3 big deal. Like when I wanted to help with certain
4 things, they were having -- redoing our grant, and,
5 you know, I let her know I was open because they were
6 all stressed out trying to get this grant completed
7 and I knew I had very good computer skills and they
8 were having training that if I could go to the
9 training and help with any of the things that they
10 needed, but that's no big deal. It's not on there.
11 But, yes, this is --

12 Q. And tell me again when you resigned.

13 A. June 27th, I think. The end of June.

14 Q. Of 2005?

15 A. Yes.

16 Q. And the question asks about every attempt you
17 made to find employment or pursue education or
18 training since January 1, 2001, to the present.
19 Nothing is listed subsequent to January 2005. I
20 assume, if this is a complete list, that means that
21 you haven't sought any employment opportunities since?

22 A. Well, sir, after January, 2005, I realized
23 there was no way I was going to put myself through
24 that ever again. I had been stressed. Like you said,

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1 my stomach, my hair.

2 After they got Andrea Collins in there, I
3 knew there was no way, and I knew there was no way I
4 was going to even continue or even try. I was told
5 earlier by my program manager once that Paul Morris
6 had mentioned to her that if I continued doing things,
7 like not conforming, that Brigitte won't go far at
8 DelTech. Those words echoed through my ears after I
9 saw Andrea Coleman walk in.

10 Q. Well, the question, though, is, this asked for
11 every attempt you have made to find employment
12 beginning January 1, 2001, to the date of the answer
13 of the answer to the interrogatory. And my question
14 is: Is it correct that you haven't made any effort to
15 seek other employment subsequent to the time you
16 resigned?

17 A. You mean at DelTech?

18 Q. Anywhere.

19 A. No.

20 Q. So this is not a complete answer?

21 A. I am getting a little confused. I don't know
22 what you are saying.

23 MS. BREWINGTON: Can you back up? I think
24 she is confused.

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1 THE WITNESS: I am totally confused.

2 MS. BREWINGTON: Back it all the way up.

3 BY MR. WILLIAMS:

4 Q. The question that you are responding to,
5 Interrogatory No. 18 --

6 MS. BREWINGTON: Can I interrupt? I think
7 what she thinks is -- you are asking her about
8 positions at DelTech?

9 THE WITNESS: Yes.

10 MS. BREWINGTON: I think you kind of need
11 to explain you are talking about.

12 MR. WILLIAMS: Let me, between you and I,
13 say that it seems to me that what we are hearing is
14 that this is not a complete answer to the
15 interrogatory, and either we need to get an update or
16 she needs to update it now.

17 MS. BREWINGTON: No. She is telling you
18 that she thought -- I guess she is thinking DelTech.

19 MR. WILLIAMS: That's not what the
20 interrogatory says.

21 MS. BREWINGTON: We need to find out what
22 she understood at the time she completed that.

23 THE WITNESS: Yes. In fact, I did seek
24 other things on the Internet. I sought other

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1 positions through the Internet, yes, I did.

2 MR. WILLIAMS: Well, what I am suggesting
3 to you is we need a listing -- if you are going to
4 answer the interrogatory fully and completely, we need
5 a listing of what they are and we haven't received it
6 to date.

7 MS. BREWINGTON: Can you confirm that
8 there are additional from January to October?

9 THE WITNESS: We are talking about until
10 now? I don't understand.

11 MS. BREWINGTON: You said "until present,"
12 but present on this is October 31st, 2005. So the
13 question is: Did she seek employment from January 1,
14 2001, through October, 2005, outside of Delaware
15 Tech.?

16 BY MR. WILLIAMS:

17 Q. Between the time that you resigned and the time
18 that you signed this affirmation on October 31, 2005,
19 did you seek other employment opportunities?

20 A. Yes.

21 Q. And are they listed here?

22 A. No.

23 Q. And subsequent to October 31, 2005, between
24 that date and today, have you sought other employment

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1 opportunities?

2 A. Yes.

3 Q. Are they listed here?

4 A. No.

5 Q. Well, I will send you a letter, but, I mean,
6 it's clear to me that we have an incomplete answer to
7 this interrogatory, and I'd, when we get a complete
8 answer, reserve my right to ask her questions about
9 whatever other employment opportunities she has sought
10 since then.

11 A. You don't want to ask that now?

12 Q. I tried to ask earlier and you told me that you
13 didn't really -- couldn't tell me. If you can give
14 me --

15 A. I sent to TRIO programs at colleges. I have
16 been looking under the TRIO program.

17 Q. I want to know what colleges, when you
18 submitted applications, and for what positions?

19 A. Okay.

20 Q. Can you tell me?

21 A. Not offhand. I have -- I do have a file.

22 Q. You have a file?

23 A. At home, mm-hmm.

24 Q. Do you have, apart from that file, do you have

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1 other documents that are relevant to this litigation
2 which you have not provided to your counsel?

3 A. Like what? If I thought they were relevant, I
4 submitted them. And you say I have an incomplete
5 answer; I never understood the question. So up until
6 January -- this whole thing, even sitting here talking
7 to you, and reading it, I thought it meant DelTech.
8 That's why.

9 Q. With respect to your claim that you have
10 suffered pain, suffering, humiliation, other than your
11 testimony about that, are there other witnesses that
12 you intend to offer if this case goes to trial?

13 A. My coworker, Ken Cole, my secretary, my
14 children, my fiancée.

15 Q. Can you identify your children and fiancée?

16 A. Okay. Yes. Anthony Brown, Eyan, E-y-a-n.

17 Q. I am sorry?

18 A. E-y-a-n, Eyan Evans Brown.

19 Q. Okay.

20 A. Brigitte, same name, Evans Brown. Eli is too
21 small. I have one more child, but that's Eli Evans
22 Brown. Jimmy Bunkley.

23 Q. Jimmy Bunkley?

24 A. Yes, my fiancée. Ken Cole, he is a witness.

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1 Liz Wilson.

2 Q. Have you talked to Liz Wilson about testifying?

3 A. Who? Me?

4 Q. Yes.

5 A. No. I haven't spoken to her lately.

6 Q. How old are your children?

7 A. At this point, Anthony is 17. Eyan just turned
8 12. "Bri" just turned 11. And Eli is eight.

9 Q. Do they live with you?

10 A. Yes.

11 Q. In Texas?

12 A. They are in Texas. My son isn't in Texas.

13 Q. Your oldest?

14 A. Anthony is here.

15 Q. Given the obligations that you have assumed
16 caring for your brother, are you able to work now?

17 A. I am not caring for him. I am there for
18 support. My brother has all his medical, all his
19 everything that he needs taken care of. My brother
20 went through a major depression and I am there to
21 support him fully. And I am not literally medicating
22 him or anything like that. But the answer to that is
23 yes.

24 Q. You are able to work?

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1 A. Yes. Another person for that list who knows is
2 my cousin, her name is Renee. My mother passed away
3 and Renee is my cousin who was my mother's age who is
4 real close to me, Renee DuJean, D-e-J-e-a-n, DuJean.

5 Q. Where does Renee live?

6 A. Wilmington.

7 Q. Where does your fiancée live?

8 A. Texas. He is strictly in Texas.

9 Q. When did you get engaged?

10 MS. BREWINGTON: Objection.

11 BY MR. WILLIAMS:

12 Q. Was he a part of your life during the time you
13 worked for the college?

14 A. Yes, he was.

15 Q. Is he from Delaware?

16 A. Yes.

17 Q. Who did you talk to about your decision to
18 resign from the college before you resigned?

19 A. My father, my sister. I talked to Ken. And
20 probably, of course, my fiancée and probably some
21 other friends.

22 MR. WILLIAMS: I think I may be done. Let
23 me just take five minutes to make sure.

24 (Recess taken.)

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1 BY MR. WILLIAMS:

2 Q. I just have two or three more questions.

3 You made a statement that there were no
4 African-American managers until after you filed the
5 complaint; do you remember saying that?

6 A. Well, in our TRIO program, except for my
7 program manager.

8 Q. Then, prior to that, I asked you about your
9 statement that you made about African-Americans being
10 systematically removed, and you mentioned Gene Barnes
11 and Charles Madden?

12 A. And I mentioned that was before I got there.

13 Q. And they were African-American managers in the
14 TRIO program?

15 A. To my knowledge.

16 Q. And in answering my question, or making the
17 statement about African-American managers, did you
18 limit your response to just the youth programs
19 division of CCP or were you talking about --

20 A. Yes. I don't know anything else about it. I
21 am only --

22 Q. CCP is a big program?

23 A. Right. And I don't know what they have.

24 Q. So you don't know about who the managers were

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1 outside of your youth --

2 A. I am up there in the federal youth program.

3 MR. WILLIAMS: I have no further
4 questions.

5 (The deposition was concluded at 12:35
6 p.m.)

7 INDEX

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DEPOSITION OF: BRIGITTE L. BROWN

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EXAMINATION

PAGE

11

Examination by Mr. Williamn

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13 Brown Exhibit No. 1 entitled "Complaint" was marked
for identification..... 69

14

15 Brown Exhibit No. 2 entitled "Plaintiff Brigitte
Brown's Response to Defendant's First Set of
Interrogatories Directed to Plaintiff, Brigitte Brown"
was marked for identification..... 78

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Notary _____

BRIGITTE L. BROWN

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Brigitte L. Brown

State of Delaware)
)
New Castle County)

CERTIFICATE OF REPORTER

I, Renee A. Meyers, Registered Professional Reporter and Notary Public, do hereby certify that there came before me on the 6th day of February, 2006, the deponent herein, BRIGITTE L. BROWN, who was duly sworn by me and thereafter examined by counsel for the respective parties; that the questions asked of said deponent and the answers given were taken down by me in Stenotype notes and thereafter transcribed into typewriting under my direction.

I further certify that the foregoing is a true and correct transcript of the testimony given at said examination of said witness.

I further certify that I am not counsel, attorney, or relative of either party, or otherwise interested in the event of this suit.



Renee A. Meyers
Certification No. 106-RPR

DATED: February 7, 2006

CORBETT & WILCOX